

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE FIRST SET OF
INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO NATIONAL POSTAL MAIL
HANDLERS UNION WITNESS HAGGARTY
(USPS/NPMHU-T4-1-6)
(May 23, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production to National Postal Mail Handlers Union witness James Haggarty (NPMHU-T-4).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 23, 2012

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO NPMHU WITNESS HAGGARTY

Instructions and Definitions

The term “describe” shall mean to detail in full, with specificity, the event or situation at issue.

The term “documents” has the meaning as ascribed within the Federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the witness.

The term “relating” shall mean pertaining, describing, referring, evidencing, reflecting, discussing, showing, supporting, contradicting, refuting, constituting, embodying, containing, concerning, identifying, or in any way logically or factually connected with the matter discussed.

The words “or” and “and” shall be read in the conjunctive and not in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of a request. The use of a verb in any tense shall be construed as the use of the verb in all other tenses and the singular form shall be deemed to include the plural, and vice-versa. The singular form of any noun shall be deemed to include the plural, and vice-versa.

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR
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Interrogatories and Requests for Production

USPS/NPMHU-T4-1: On page 2; lines 8 through 10 of your testimony, you state:

[t]he Postal Service . . . has not budgeted for adequate staffing to operate these hubs.

- a. Please state your understanding of whether the Postal Service included, in the respective AMP studies, calculations for future staffing levels in each of the ten Postal Service facilities identified on page 2 of your testimony.
- b. Please produce any documents or data that you relied upon in support of the above quoted statement from your testimony.

USPS/NPMHU-T4-2: On page 2, lines 17 through 19 of your testimony, you state “Mail Handlers perform many allied duties in support of the letter carriers, so more carrier normally would mean more Mail Handler work. In addition to mail handlers, describe, in detail, what other Postal Service employees and contractors support letter carriers by, among other tasks, removing containers from trucks and moving containers throughout Postal Service facilities, including but not limited to Function 4 facilities.

USPS/NPMHU-T4-3: On page 3, lines 12 through 13 of your testimony, you state:

[w]hen they are not adhered to, the machines tend to break down more often and for longer periods of time, interrupting the normal process.

- a. Please describe, in detail, your experience, education, or training related to the maintenance procedures, routines or operating parameters of mail processing equipment used by the Postal Service, including but not limited to that mail processing equipment located at the Grand Rapids, Michigan P&DC.
- b. Please produce any documents or data that you relied upon in support of the above quoted statement.

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USPS/NPMHU-T4-4: On page 3, lines 14 through 16 of your testimony, you state that you had “conversations with Postal Management” regarding “the substantial risk of increased equipment failure.”

- a. Please describe, in detail, your conversations with Postal Service management, regarding the substantial risk of increased equipment failure, including but not limited to the identity of the individuals with whom the conversations occurred, the time when the conversations occurred, the location of the conversations, and the mode of communication for the conversations, be it in-person, telephonic or by any other means.
- b. Please produce any documents relating to those conversations.

USPS/NPMHU-T4-5: On page 3, lines 17 through 20 of your testimony, you state:

[t]he most baffling aspect of the AMP studies is that the Postal Service is claiming that it will save money on current transportation costs by trucking mail, an average of one hour and twenty minutes to another facility to be processed, and then trucking it back to be delivered.

- a. Please describe, in detail, your experience, education, or training related to the logistics management and transportation of mail between Postal Service facilities, including but not limited to the costs and savings analyses of transporting mail to or from the ten Postal Service facilities identified on page 2 of your testimony.
- b. Please produce any documents or data that you relied upon in support of the above quoted statement.

USPS/NPMHU-T4-6: On page 3, lines 23 through 23 of your testimony, you state:

[a] viable business model does not decrease customer service as a means of sustaining a customer base.

- a. Please describe, in detail, your experience, education, or training related to business models, plans or strategies and other economic tools used to develop and explore business opportunities and values, including but not limited to your experience, education, or training to support your statement.
- b. Please produce any documents or data that you relied upon in support of your statement.